



**Via Hand Delivery**

January 27, 2004

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, MA 02110

Re: Report Re: Reducing Double Poles, D.T.E. 03-87

Dear Ms. Cottrell:

Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company, d/b/a NSTAR Electric ("NSTAR Electric" or the "Companies") hereby file the following information in compliance with the Department of Telecommunications and Energy's (the "Department") Report Re: Reducing Double Poles, D.T.E. 03-87, at 15-16 (2003) (the "Report"). In its Report to the Legislature pursuant to Section 110 of Chapter 46 of the Acts of 2003, the Department directed owners of utility poles to submit plans for eliminating the backlog of double utility poles as soon as reasonably practicable. Report at 15-16. The Department noted that it will examine these plans and determine their reasonableness as part of its ongoing investigation of double utility poles. Id.

As of January 25, 2004, the Companies estimate that 11,418 double pole sets are in existence with NSTAR Electric's respective service territories. The double pole sets are created by the installation of a new utility pole beside an existing pole, usually because of: (1) the poor condition of the "old" pole in the set; (2) the need for taller poles for system improvement and new customer projects; (3) the acts of public authorities (e.g., road widening projects); and (4) the need to replace damaged poles. The Department recognized in its Report that the root cause of the existence of double pole sets for prolonged periods of time is directly related to the failure of pole tenants to transfer their facilities from the old pole to the new pole in a set in a timely manner. Id. at 16. It must be noted that, of the double pole sets currently in existence the Companies' respective service territories, over half require pole tenants to transfer their facilities within the set.

However, given the clear policy articulated by the Department in the Report requiring pole owners to eliminate their backlog of double pole sets as soon as reasonably practicable, the Companies propose the following plan to effect the Department's requirement:

- (1) eliminate the current backlog of double pole sets in 3 years (by end of 2006);
- (2) manage the pole management system database ("PLM") to ensure that accurate information regarding double pole sets is reflected and ensure that pole tenants are

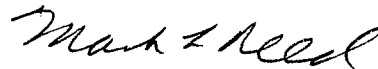
notified that they are "next in line" for moving their facilities from the old pole to the new pole in a set;

- (3) dedicate work crews to eliminate the backlog, based on prioritization;
- (4) prioritize the elimination of double pole sets by first removing pole sets in communities with the highest volume of sets; and
- (5) hold NSTAR Electric regional directors accountable for daily management of the PLM database and the elimination of the double pole backlog.

In addition, the Companies propose to minimize any new backlog of double pole sets by requiring the transfer of NSTAR Electric facilities on any newly-created double pole set to occur contemporaneously with the installation of the set. In this manner, the Companies can start the process of notifying pole tenants of their responsibility to move their attachments on new double pole sets more quickly and thus, reduce the period in which double pole sets are in existence.

The Companies also commit to work closely with the Department and the communities that the Companies' serve to more effectively communicate issues relating to their double pole mitigation plan, including issues relating to the PLM pole management system. NSTAR Electric looks forward to working with interested parties to implement its plan and reduce the number of double pole sets in the Companies' service territories over the coming months.

Sincerely,



Mark Reed, Esq.  
Director of Government Affairs  
(781) 441-3776

cc: Ronald LeComte, Electric Power Division